



Ironside Newark
110 Edison Place, Suite 302
Newark, New Jersey 07102
Tel: 973.690.5400 Fax: 973.466.2761
www.rwmlegal.com

July 14, 2023

VIA ECF

Hon. Michael E. Farbiarz, U.S.D.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: *Ham v. Novartis International AG, et al.,*
Civil Action No. 23-03503 (MEF) (MAH)**

Dear Judge Farbiarz:

This firm, along with Kirkland & Ellis LLP, represents Defendants in the above-captioned litigation. We write to request a short, fourteen (14) day extension to Defendants' current deadline of July 19, 2023 to answer or otherwise respond to Plaintiff's Amended Complaint. Defendants submit that the instant request is modest and reasonable, and respectfully should be granted.

Plaintiff filed an Amended Complaint on June 29, 2023. Dkt. 4. The Amended Complaint contains two additional Counts, as well as changes to Plaintiff's factual allegations.

Defendants submit that Plaintiff's anticipated remand motion (which is due no later than July 28, 2023) should be filed before Defendants' responsive pleading because, depending on what is included in Plaintiff's remand motion, the parties may be able to discuss a resolution on that issue. In addition, Defendants are investigating Plaintiff's additional counts and amended allegations in the Amended Complaint but require additional time to complete their investigation and to prepare Defendants' response.

Counsel for Defendants conferred with Counsel for Plaintiff on this requested extension, but we have not yet received a response. Defendants therefore respectfully request the Court enter an order extending the deadline for Defendants to file their response to Plaintiff's Amended Complaint by fourteen (14) days, until August 2, 2023.

We thank the Court for its kind consideration of this submission.

Respectfully submitted,

s/ Justin T. Quinn
Justin T. Quinn

SO ORDERED

s/Michael A. Hammer
Michael A. Hammer, U.S.M.J.

cc: All counsel of record (via ECF)

Date: 7/17/2023